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6 *Attorneys for Defendant*
7 *Southwest Medical Associates, Inc.*

8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 MARGUERITE BRATHWAITE, M.D., an
11 individual,

12 Plaintiff,

13 v.

14 SOUTHWEST MEDICAL ASSOCIATES,
15 INC., an active Nevada domestic Corporation;
DOES 1-10 and ROE ENTITIES 1-10,
16 inclusive.

17 Defendants.
18

Case No.: 2:22-cv-00729-JCM-NJK

**STIPULATION TO EXTEND THE
MARCH 8, 2024 DEADLINE TO FILE
A MOTION FOR ATTORNEY'S
FEES AND COSTS PURSUANT TO
FED. R. CIV. P. 54**

First Request

19 IT IS HEREBY STIPULATED by and between Plaintiff Marguerite Brathwaite, M.D.,
20 ("Plaintiff"), through her counsel F. TRAVIS BUCHANAN, ESQ., of the law firm F. TRAVIS
21 BUCHANAN, ESQ., & ASSOCIATES, PLLC., and RODNEY S. DIGGS, of the law firm IVIE
22 McNEILL WYATT PURCELL & DIGGS, and SOUTHWEST MEDICAL ASSOCIATES, INC.,
23 ("Defendant") through its counsel JACKSON LEWIS P.C., that the current March 8, 2024, deadline
24 to file a motion for attorney's fees and costs pursuant to FRCP 54 be extended to March 29, 2024.
25

26 1. On January 24, 2024, Magistrate Judge Koppe entered a report and recommendation
27 that Defendant's Motion to Enforce Settlement be granted. ECF No. 90.
28

2. On February 23, 2024, Judge Mahan entered an order adopting Magistrate Judge Koppe's report and recommendation. ECF No. 99.

3. Judge Mahan further ordered the parties to submit the required dismissal paperwork by March 22, 2024. ECF No. 99.

4. Pursuant to Fed. R. Civ. P. 54(d), Defendant has until March 8, 2024, to file a motion for attorney's fees and costs.

5. The parties are in the process of finalizing the written settlement agreement and preparing the necessary dismissal documents.

6. The parties desire to complete this process without incurring potentially avoidable additional motion practice. Accordingly, the parties hereby stipulate and agree that Defendant's deadline to file a motion for attorney's fees and costs shall be extended from March 8, 2024, to March 29, 2024.

7. This request is made in good faith and not for the purpose of delay.

DATED this 7th day of March, 2024

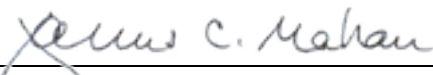
F. TRAVIS BUCHANAN, ESQ., & ASSOC., JACKSON LEWIS P.C.
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Southwest Medical Associates, Inc.

ORDER

IT IS SO ORDERED:


UNITED STATES DISTRICT JUDGE

Dated: March 13, 2024